

REMARKS

Status of the Claims

- Claims 4-9, and 12 are pending in the Application after entry of this amendment.
- Claims 4-9, and 12 are rejected by Examiner.
- Claim 9 is amended by Applicant.

Claim Rejections Pursuant to 35 U.S.C. §112

Claims 4-9, and 12 are rejected under 35 U.S.C. 112, second paragraph as being indefinite. Specifically, Claims 9 is unclear concerning the means for managing the introduction or withdrawal of new gateway modules.

Applicant amends Claim 9 to remove the “means for” language regarding the management function. Claims 4-8 and 12 depend on independent Claim 9.

Applicant respectfully requests reconsideration and withdrawal of the 35 USC §112 rejection of pending Claims 4-9 and 12 based on the above amendment.

Claim Rejections Pursuant to 35 U.S.C. §103

Claims 5, 7, and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,505,255 to Akatsu et al. (Akatsu) in view of US Patent Publication No. 2001/0012319 to Foley in view of U.S. Patent No. 6,434,170 to Movshovich et al. (Movshovich). Applicant respectfully traverses the rejection via amendment.

Independent Claim 9 is amended to include the aspects that each gateway module is connected to at least one external device and that adding new gateway modules increases the number of isochronous channels on the local area network. Support the amendment is found in the as-filed specification on page 11 lines 20-31, and Figure 3.

Applicant submits that none of the cited references discuss a local area network that comprises a gateway which is distributed among a plurality of devices, each gateway is connected to an external data source and all the gateways are chained together on a local area network.

Akatsu describes a centralized gateway 504 which is then connected to a local area network. Applicant concludes that the central gateway architecture of Akatsu creates a bottleneck due to a maximum number of connections that are allowed simultaneously on the gateway. Accordingly, Applicant submits that Akatsu does not provide a scalable and distributed gateway as described in Applicant's invention.

In order to clarify the invention, the Applicant has amended claim 9 by stressing that the gateways are each connected to an external data source, that the gateways are chained together on the local area network, and that adding new gateway modules increases the number of isochronous channels on the local area network.

These aspects are not discussed in Foley. Foley shows on figure 16 a totally different architecture. Foley does not disclose local area network gateways that are all chained together. Applicant respectfully submits that the combination Akatsu and Foley, would not instruct one skilled in the art to obtain a system where the gateways are chained together on a local area network, each gateway being connected to an external data source. Applicant notes that in Foley, there is no way to introduce new gateway modules which will not burden the load on the network. Indeed, in the Applicant invention, the introduction of an external source is done by the introduction of a new chained gateway which therefore add capabilities on the local area network. When a gateway is added, it also increases the number of isochronous channels on the local area network, and therefore increases the bandwidth on the local area network. Nothing is Akatsu nor in Foley discusses these advantages.

Movshovitch discusses a device handling MPEG-2 data, but does not address gateway scalability. Therefore, the combination of Movshovitch with Akatsu and Foley does not disclose a system as recited in claim 1, and the combination of references particularly does not describe a system where there is a distributed gateway made of gateway modules chained together, each connected to at least one external data source

and connected to a same local area network, where the insertion of a new gateway module is not a burden on the network as it also creates more bandwidth on the network, by increasing the number of isochronous channels.

Since Movshovitch, like Akatsu and Foley, fails to teach or suggest the aspects that each gateway module is connected to at least one external data source, the gateway modules being chained together, and by adding new gateway modules, increases the number of isochronous channels increases on the local area network, as recited in amended pending Claim 9, then the combination of Akatsu, Foley, and Movshovitch cannot render the pending claims obvious under 35 USC §103(a) under MPEP §2143 because all of the elements are not found in the combination of references. Also, one of skill in the art would not be motivated to combine the cited references to realize the presently claimed invention because of the elements missing in the combination. Applicant respectfully requests reconsideration of the 35 U.S.C. §103(a) rejection of pending Claims 5, 7, and 9 based on the amendments and remarks above.

Claim Rejections Pursuant to 35 U.S.C. §103

Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,505,255 to Akatsu et al. (Akatsu) in view of US Patent Publication No. 2001/0012319 to Foley in view of U.S. Patent No. 6,434,170 to Movshovich et al. (Movshovich) and in further view of U.S. Patent No. 6,353,613 to Kubota et al. (Kubota). Applicant respectfully traverses the rejection.

Claim 4 depends on independent Claim 9. As discussed above, Claim 9 is patentably distinct over the combination of Akatsu, Foley, and Movshovitch. Kubota also fails to teach or suggest at least the Claim 9 aspects that each gateway module is connected to at least one external data source, the gateway modules being chained together, and by adding new gateway modules, increases the number of isochronous channels increases on the local area network. Accordingly, Claim 4 is also patentably distinct and is not rendered obvious over the combination of Akatsu, Foley,

Movshovitch and Kubota per MPEP §2143.03 because Claim 4 depends from patentably distinct Claim 9. Applicant respectfully requests reconsideration of the 35 U.S.C. §103(a) rejection of pending Claim 4 based on its dependence on Claim 9.

Claim Rejections Pursuant to 35 U.S.C. §103

Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,505,255 to Akatsu et al. (Akatsu) in view of US Patent Publication No. 2001/0012319 to Foley in view of U.S. Patent No. 6,434,170 to Movshovich et al. (Movshovich) and in further view of U.S. Patent No. 6,850,252 to Hoffberg. Applicant respectfully traverses the rejection.

Claim 6 depends on independent Claim 9. As discussed above, Claim 9 is patentably distinct over the combination of Akatsu, Foley, and Movshovitch. Hoffberg also fails to teach or suggest at least the Claim 9 aspects that each gateway module is connected to at least one external data source, the gateway modules being chained together, and by adding new gateway modules, increases the number of isochronous channels increases on the local area network. Accordingly, Claim 6 is also patentably distinct and is not rendered obvious over the combination of Akatsu, Foley, Movshovitch and Hoffberg per MPEP §2143.03 because Claim 6 depends from patentably distinct Claim 9. Applicant respectfully requests reconsideration of the 35 U.S.C. §103(a) rejection of pending Claim 6 based on its dependence on Claim 9.

Claim Rejections Pursuant to 35 U.S.C. §103

Claim 12 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,505,255 to Akatsu et al. (Akatsu) in view of US Patent Publication No. 2001/0012319 to Foley in view of U.S. Patent No. 6,434,170 to Movshovich et al. (Movshovich) and in further view of U.S. Patent Publication No. 2002/0067718 to Coupe et al. (Coupe). Applicant respectfully traverses the rejection.

Claim 12 depends on independent Claim 9. As discussed above, Claim 9 is patentably distinct over the combination of Akatsu, Foley, and Movshovitch. Coupe also fails to teach or suggest at least the Claim 9 aspects that each gateway module is connected to at least one external data source, the gateway modules being chained together, and by adding new gateway modules, increases the number of isochronous channels increases on the local area network. Accordingly, Claim 12 is also patentably distinct and is not rendered obvious over the combination of Akatsu, Foley, Movshovitch and Coupe per MPEP §2143.03 because Claim 12 depends from patentably distinct Claim 9. Applicant respectfully requests reconsideration of the 35 U.S.C. §103(a) rejection of pending Claim 12 based on its dependence on Claim 9.

Conclusion

Applicant respectfully submits that the amended pending claims patentably define over the cited art and respectfully requests reconsideration and withdrawal of the rejections of all pending claims based on the amendments presented herein.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefore.

Respectfully submitted,
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